



I am writing as the owner of radio stations in small, unrated markets. My personal experience includes 21 years in radio. The first 12 years of my radio career were spent working in a large market. My ownership tenure has been in small markets and it is from the small and rural market perspective that I respectfully submit my comments on the LPFM proposal.

There seems to be little, if any spectrum left in large markets for low power stations, so the impact of LPFM in small markets should be carefully evaluated. It is my hope the following comments regarding the proposed LPFM service will help convince the Commission that LPFM is not a better way to serve the public interest.

The first area of concern regarding LPFM is interference to existing stations. I am not an engineer and will leave the technical discussions to those with a technical background. However, I must join other broadcasters in asking the commission not to jeopardize the coverage of existing stations or the opportunity to move to digital broadcasting in order to create LPFM.

Maintaining the integrity of the spectrum should be the highest priority of the Commission. LPFM should not be considered until all studies have been completed and it can be determined beyond a reasonable doubt that the proposed service will not interfere with both current and potential IBOC broadcasting by existing stations.

Many small market stations are Class A FM signals. Once a digital standard for FM has been successfully tested and implemented, and if it is determined that interference standards can then be relaxed, Class A FM stations should first be allowed to increase power to 25,000 or 50,000 watts before creating a new service.

Small market broadcasters already provide the services suggested in the NPRM. We broadcast high school sporting events, cover local civic and community meetings and events, provide news and weather bulletins as well as school closing announcements. We also offer very localized exposure attractive to local businesses that can't afford the national advertising of large chain operations. In fact, many AM and Class A FM stations specialize in these services and could not survive without providing them.

The NPRM seeks comment on whether the populations in service areas of LP1000 stations could be large enough to

sustain an advertising base. In large markets the LP1000 stations will not have a coverage area large enough to be relevant even if there is spectrum to allocate for LPFM, and in most small markets the local advertising base is shrinking due to consolidation of other businesses, while there is more competition for the advertising dollar.

Radio advertising is not a business in and of itself. We compete for advertising dollars, not just radio advertising dollars. If the market is flooded with more signals and existing signals are weakened due to interference from low power stations, advertisers can take their advertising budgets from radio and put them into television, cable, newspapers, outdoor advertising, the internet, or any other advertising medium, as radio would become ineffective in reaching a significant number of people.

The commission should not be concerned about the economic viability of LPFM without concern for the economic status of existing independent operators. There is no argument to favor one class of independent over another.

In regards to SERVICE PROPOSALS AND ISSUE ANALYSIS for LPFM:

Any and all licensed operators should have to follow the commissions rules regardless of operating power. All stations should be mandated to the same public interest

programming requirements. Low power status does not ensure serving the public interest solely by the nature of lower power.

An LP100 or microradio station could definitely have an impact on local elections and should be held to the same political rules as full power stations. The main studio rule, public file rules and ownership reporting rule are important for all local stations and should be binding on any new service to be considered.

All stations, regardless of power, should be required to follow EAS regulations. The public has been able to rely on broadcast stations for emergency information for many years. If, for example, a tornado warning has been issued the person listening to the proposed low power station should receive the same warning broadcast on all other stations.

LPFM stations should be shut down automatically if proven to cause impermissible interference.

In considering any new class of service current independent owners should not be automatically excluded. Today's small market broadcaster has invested valuable time, money and expertise into serving local communities. There is no evidence that those who have never operated a radio

station will serve the public interest better than those with experience. To exclude current small broadcasters from participating from any new service would have to be considered discriminatory.

Should the Commission determine the need for some type of LPFM service, solutions could include the creation of non-commercial licenses in the educational band, potentially using the ideas set forth in the Leggett Petition referred to in the NPRM. A service limited to one watt of transmitter output power and an antenna height of 50 feet using a single FM channel nationwide may be a solution to provide some LPFM service without disrupting the commercial or educational bands. The AM band cannot withstand anymore congestion.

If there is such great concern about concentration of media ownership then there should be no impending launch of satellite DARS. In effect, a new, superior radio band has been given to just two licensees. These licensees will have superior national coverage, terrestrial repeaters for local insertion, CD audio quality, and the tremendous advantage of owning and operating 100 channels nationwide. Jamming the FM dial with more signals and interference to existing signals will only help radio audience migration to one of the two voices of DARS.

As the internet grows and webcasting develops, anyone who wants a "voice" can have one for much less than the cost of a radio station, without degradation of any existing service. Protecting the spectrum is not rationing free speech. Ownership of a radio station isn't the only method of free speech. Limiting ownership to protect the spectrum does not limit one's ability to be heard. Today's technology provides more choices and more outlets for diverse voices than ever before. There is no need for LPFM at the expense of the technical integrity of the FM band or existing independent operators.

An LPFM service would be barely noticed in the largest markets where few if any LPFM signals would be available. However, it is conceivable that the end result of a new LPFM service would be an unviable band, both technically and economically, of full power and low power FM stations in small and rural areas.